

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of )  
 )  
Review of the Commission's Broadcast and ) MM Docket No. 98-  
204  
Cable Equal Employment Opportunity Rules )  
and Policies )  
  
TO THE COMMISSION

REPLY COMMENTS OF EEO SUPPORTERS

EXHIBIT 1 \*/

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\*/ This Exhibit was originally appended to the Reply Comments filed May 29, 2002, which were e-mailed and mailed to the FCC. The Exhibit apparently was not translated properly and thus not associated with the Reply Comments on the Commission's website. Thus, this Exhibit is being re-filed electronically today, June 28, 2002.

EXHIBIT 1

Statement of Dr. C. Ann Hollifield, Dr. Dwight E. Brooks and  
Dr. Lee B. Becker

May 29, 2002

**Statement of Dr. C. Ann Hollifield,  
Dr. Dwight E. Brooks and Dr. Lee B. Becker**

May 29, 2002

In re:    Review of the Commission's Broadcast and Cable Equal                      Employment  
Opportunity Rules and Policies

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From:<sup>2/</sup>

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Dr. Dwight E. Brooks, Associate Professor & Co-Coordinator, Michael J. Faherty Broadcast Management Laboratory, Department of Telecommunications, Grady College of Journalism & Mass Communication, University of Georgia

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Dr. Hollifield is an Associate Professor & Co-Coordinator of the Michael J. Faherty Broadcast Management Laboratory, a center that focuses on research, teaching and consulting in the management and economics of the broadcast and cable industries. She also serves as a Senior Policy Fellow at the Voinovich Center for Leadership and Public Affairs at Ohio University. Her research focuses on the effects of media industry structures such as labor-force demography and ownership on media content and performance. Additionally, she studies the effects of the mass media and telecommunications on the economy and economic development.

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<sup>2/</sup> Curriculum vitae available on request.

Dr. Brooks is Associate Professor & Co-Coordinator of the Michael J. Faherty Broadcast Management Laboratory. His research includes media criticism, media literacy, cultural studies and electronic media programming. His various research on race, gender and the media in general, and African American history and mediated cultural experiences in particular has appeared in several journals that include Journalism and Communication Monographs, the Howard Journal of Communications, Communication Studies, Symploke and The Velvet Light Trap. He also has published several textbook chapters and has presented at a variety of academic and professional conferences.

Dr. Becker is Director of the James M. Cox Jr. Center for International Mass Communication Training and Research, a center that does professional education for journalists in emerging democracies around the world in support of the development of an independent media. Dr. Becker's research program focuses on journalism education and industry labor force issues. He is the author of the annual surveys of Journalism and Mass Communication, which examine the factors that affect journalism students' success in entering the labor force, including such issues as gender and race/ethnicity. Additionally, he studies the daily newspaper industry's hiring patterns through a survey conducted every five years and is considered one of the world's leading experts on media industry labor force issues.

The proposals before the FCC to eliminate the requirement that broadcasters file annual employment reports (Form 395) or alternatively, to permit that data to be classified as confidential or to be published only after all station and market identifiers have been removed, would have a significant negative impact on media scholarship. We are, therefore, requesting that the Commission continue to require that such data be made available to the public in a timely manner.

In their "Comments of EEO Supporters," ("Comments") a coalition of interested organizations noted that the loss of access to station- and market- specific data would make it more difficult to study the relationship between approaches to employee-recruitment and actual hiring outcomes. This is true. However, that argument reflects only one narrow area of scholarship that would be negatively affected by lack of timely access to station and market-specific employment data. Media research programs in a number of other areas also would be impacted, including research into news construction, the media labor market, and studies of media management and economics in general where the labor market is an independent variable.

Forty years of research on news construction makes it clear that media content is significantly shaped by both the specific individuals and the specific organizations that generate it (Breed, 1955; Gieber, 1964; Hollifield, 1999; Shoemaker and Reese, 1996; Tuchman, 1973). But scholars are only beginning to understand the specific mechanisms through which individual, organizational and market variables interact to influence media content. Recently, the FCC cited empirical and anecdotal evidence regarding the relationships between the demographic makeup of the employees of media organizations and the content those organizations produce. See Review of the Commission's Broadcast and Cable Equal Employment Opportunity Rules and Policies (Report and Order), 15 FCC 2329, 2349-2358 Para. 48-62 (2000) (subsequent history omitted). However, not all parties in this rulemaking proceeding agree that this nexus between employment and programming exists, nor do all parties agree on how strong it is.

That the internal organizational structures of media companies shape media content and programming is no longer seriously disputed by scholars. Nonetheless, there has been relatively little research on the nuances of the relationships between minority employment and programming. To give a few examples, it would be useful to know whether organizational demography affects news content differently during times of routine programming and times of major events of gender/ethnic/racial concern. Research is also needed on whether different types of media have stronger employment/content relationships; whether different types of jobs have greater or lesser effects on programming and content; whether ownership or format choice has greater influence on non-form programming content, and whether employment in stand-alone or in consolidated media operations appears to have more influence on programming. It also would be useful to know whether it is the statistical representation of minority or female employees, or whether it is the commitment of an employer to promoting diversity (as measured by its participation in community-based outreach activities or its adoption of workplace quality initiatives such as mentoring programs) that appears more closely tied to programming. Without readily available station-specific and market-specific employment data broken out by job type, race and gender, none of this important research on one of our most important industries can be performed.

This is particularly true in the local market broadcast industry where historical copies of the complete audio/video content of broadcasts are extremely difficult and prohibitively expensive to obtain, if they are available at all. In order for scholars to conduct the type of research the Commission has called for, it would be necessary to have nearly immediate access to employment data so that a sample of stations could be selected and arrangements made to obtain copies of broadcasts as they aired.

These issues of news construction are becoming increasingly important to understand in this era in which deregulation is creating greater industry consolidation both nationally and within local markets through duopolies. As a result of market duopolies, the information the public receives about their local communities is being provided by ever fewer sources. While new technologies such as the Internet may well make more information and voices available on a global basis, independent sites devoted to the coverage of local community governmental bodies such as zoning boards and county commissions have yet to appear on a widespread basis as an alternative to traditional media. Therefore, the public continues to have an interest in understanding the organizations and individuals that provide this information, which is necessary for citizen participation in community self-governance. From both a scholarly and policy standpoint, it also has become increasingly important that we improve our understanding of the how organizational culture, structure and demography affect information creation and distribution.

Similarly, the media industry, policy makers and the public have a shared interest in understanding the dynamics of the media labor market. As the "Comments" noted, the media industry relies upon human capital as its primary asset. The quality of media products and the success of media businesses are largely dependent upon the industry's ability to attract and retain talented, qualified individuals.

Media industry leaders have identified a number of issues related to the industry labor market that are of particular concern. One of those, of course, is the level of diversity in the industry, which the National Association of Broadcasters has expressed its commitment to maintaining and increasing. However, other labor-market related concerns include the size and qualifications of the talent pool available to media businesses, in general. Moreover, those labor market concerns affect different media sectors differentially. One of the most common complaints faculty in university journalism and mass communication programs hear from industry leaders is about an overabundance of applicants in some sectors of the industry, but a general lack of what the industry considers to be “qualified” talent. Additionally, some industry sectors, such as small-market radio stations, report difficulty in finding job applicants in general.

Research into media labor-market issues is a relatively new area of study among journalism and mass communication scholars. Such work as has been done has identified a number of factors that affect the media labor market, including the demography of the surrounding community (Sikes, 2000; Whittaker, 2000), the culture of the media organization itself (Hollifield, Kosicki and Becker, 1999) and the specific elements of educational preparation that entry-level job seekers bring to the table (Becker, Lauf and Lowry, 2000). However, the ability of scholars to further assist the industry in understanding the issues it faces in the critical area of human capital will depend upon their continuing ability to have timely access to station and market-level data on industry employment outcomes.

Finally, the larger field of media management and economics is still relatively young. Only in the past 15 years have a significant number of scholars turned their attention to studying the economic and managerial dynamics of the industry. Scholars working in media management and economics are focused both on helping the industry improve its business performance, and on helping industry leaders, policy makers and the public understand the ways in which the economic and managerial dynamics of the media industry influence media content and, ultimately, society. While some of this research can be conducted at an industry-wide level, achieving in-depth understanding requires use of a smaller sample that can be more carefully studied and controlled. In such research, labor may well serve as a crucial independent variable. To allow station- and market-level employment data to be classified as proprietary, or to report it only when aggregated at the industry level, is to cripple researchers’ ability to study the dynamics and effects of the human-capital intensive media industry.

That such research is important is difficult to argue. Communication industries are one of the critical infrastructures necessary to the efficient functioning of every society. The “Comments” have thoroughly outlined many of the sociological and policy issues and benefits derived from understanding the relationship between employment diversity and media performance. Among the major issues they have addressed are the impact of organizational diversity on organizational creativity, problem solving and ability to compete in global markets; the impact of discrimination or failure to recruit diversity in small-market stations on the ability of large-market stations and networks to achieve diversity because of career-path flows in the industry and the subsequent long-term impact on those larger organizations to achieve global competitiveness, and the impact of organizational diversity on the broadcast industry’s ability to provide the public with the full range of media products and services that should be available. We fully support the argument in the “Comments” that these issues are of major importance to the public and that further research is needed in order for scholars and policy makers to fully understand them. Employment data on race, gender and job title at the market and station levels are required in order to conduct such research.

The possible loss of access to broadcast industry employment data has other potential effects of social science research in support of policy that the “Comments” did not address, however. One of the most significant of these research areas is the economic impact of mass media and telecommunications industries on society.

The media’s impact of society is not merely social, it is also economic. The media are a critical and growing industry in the U.S. economy, and their economic performance and success is of interest to policy makers on that basis alone. However, perhaps more importantly, in the age of the information economy, both traditional and new media play a central role in feeding economically valuable information to other businesses and industries of all types, affecting the ability of those enterprises to compete effectively in the global market.



Since the early 1980s, the United States' national and international information and communication policies have increasingly been shaped by recognition of the media's critical role in the larger economy (Hollifield & Samarajiva, 1994; Hollifield and McCain, 1995). As the "Comments" noted, organizational research has demonstrated that industries' competitive performance, creativity and problem solving are generally enhanced through employment diversity. Given the potential impact that media companies have on other businesses and industries at the local and national levels, both government and the public has an interest in thoroughly understanding the factors that shape those media enterprises' behavior and decisions. As the media industry's importance as an economic – as well as social – infrastructure increases in the future, researchers and policy makers should have access to the data they need to fully understand the factors that media performance.

We, therefore, respectfully request that the Commission continue to require timely public access to broadcast employment data, including gender and racial data, since this data is essential to a full understanding of the impact of the labor market on competition and diversity. We further request that in order to permit such scholarly research in this area to continue unimpeded, this data should be made available with station and market specific identifiers in place.

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